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May 23, 2007

The Honorable Kevin J. Martin  
Chairman, Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**RE: PS Docket No. 07-8; CC Docket No. 94-102; WT Docket  
Nos. 03-264, 06-150, 06-169 and 96-86; and EB Docket No. 06-119**

Dear Chairman Martin:

The charge of the Idaho Fire Chiefs Association (IFCA) is to provide and enhance leadership to career and volunteer emergency services in Idaho. We can think of no matter more important to supporting our efforts than the current opportunity to improve public safety communications. We ask that our collective voice be heard and our interests made a priority as the FCC creates rules in the 700 MHz proceeding.

In order to efficiently and safely command and control an emergency incident with responders from multiple jurisdictions, emergency responders need access to the most effective and robust communications capabilities. The FCC's auction of frequency spectrum in the 700 MHz spectrum band is a unique and well-timed opportunity for Public Safety to build a nationwide, wireless broadband network – a network that contemplates the end-users' needs for reliability and redundancy.

The Idaho Fire Chiefs Association urges that at least if not more than 10 MHz of the 700 MHz spectrum band be made available under rules that require the auction winner of to have an enforceable agreement with Public Safety for its participation in the National Public Safety Broadband Network as a precondition to getting their license.

It is very important that the FCC place Public Safety in an oversight position of the National Public Safety Broadband Network to be sure it is built to the standards first responders require and is managed to meet Public Safety's interests first and foremost. We ask the you license Public Safety's spectrum to a stand alone group representative of Public Safety's leadership. The network must also be a self-sustaining enterprise. The ability to extend the network to rural, insular, and underserved areas would support the need for a "universal" system.

Optimally, the service rules should only permit commercial use of the network at the discretion of the public safety licensee and only if such use does not harm the network or degrade the quality of service to public safety users. Additionally, steps should be taken to ensure that public safety

has the right to negotiate a public-private partnership with any commercial entity regardless of the outcome of the commercial auction.

To conclude, Public Safety needs to have access to a satellite overlay to extend the reach of Public Safety's network to areas where a terrestrial build is not financially attractive and as a redundancy measure in times of disasters when existing infrastructures are unavailable. This system must be kept evergreen to be competitive on the commercial side of the network and to guarantee the highest level of technology and equipment is available to public safety users.

Please do all that you can to advance this vital step towards creating the National Public Safety Broadband Network - lives depend on it!

Respectfully,

Dean Ellis  
President  
Idaho Fire Chiefs Association

Copy to:       The Honorable Michael J. Copps  
                  The Honorable Jonathan S. Adelstein  
                  The Honorable Deborah Tate  
                  The Honorable Robert M. McDowell  
                  Secretary Marlene H. Dortch